

GREENVILLE AREA TRANSIT

(GREAT)

Recipient I.D. 3101

Title VI Plan

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Background

Section 601 of Title VI of the Civil Rights Act of 1964 states the following:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Civil Rights Restoration Act of 1987 clarified the broad, institution-wide application of Title VI. Title VI covers all of the operations of covered entities without regard to whether specific portions of the covered program or activity are Federally funded. The term “program or activity” means all of the operations of a department, agency, special purpose district, or government; or the entity of such State or local government that distributes such assistance and each such department or agency to which the assistance is extended, in the case of assistance to a State or local government.

Therefore, compliance with FTA Circular 4702.1B does not relieve a recipient from the requirements and responsibilities of the DOT Title VI regulation at 49 CFR part 21, or any other requirements under other Federal agencies’ Title VI regulations, as applicable. FTA Circular 4702.1B only provides guidance on the transit-related aspects of an entity’s activities. Recipients are responsible for ensuring that all of their activities are in compliance with Title VI. In other words, a recipient may engage in activities not described in the Circular, such as ridesharing programs, roadway incident response programs, or other programs not funded by FTA, and those programs must also be administered in a nondiscriminatory manner.

Regulatory Authority

The U.S. Department of Justice (“DOJ”) Title VI regulations can be found at 28 CFR § 42.401 *et seq.*, and 28 CFR § 50.3. The U.S. Department of Transportation (“DOT”) Title VI implementing regulations can be found at 49 CFR part 21.

All programs receiving financial assistance from FTA are subject to Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and DOT’s implementing regulations. In addition, DOJ’s regulations require agencies such as DOT to issue guidelines to recipients to provide detailed information on the requirements of Title VI. In order to assist recipients in carrying out the provisions of DOT’s Title VI regulations, each of the requirements in this Circular includes a reference to the corresponding provision of 49 CFR part 21.

Additional Documents

In addition to the above-listed statute and regulations the following documents incorporate Title VI principles:

- a. The Department’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons (“DOT LEP Guidance”), 70 FR 74087, (December 14, 2005).

This guidance is based on the prohibition against national origin discrimination in Title VI of the Civil Rights Act of 1964, as it affects limited English proficient persons.

- b. Section 12 of FTA's Master Agreement, which provides, in pertinent part, that recipients agree to comply, and assure the compliance of each subrecipient, lessee, third party contractor, or other participant at any tier of the Project, with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000d *et seq.*, and with U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act," 49 CFR part 21. Except to the extent FTA determines otherwise in writing, recipients agree to follow all applicable provisions of the most recent edition of FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," and any other applicable Federal directives that may be issued. Unless FTA states otherwise in writing, the Master Agreement requires all recipients to comply with all applicable Federal directives.

Environmental Justice

Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," was signed by President Clinton on February 11, 1994. Subsequent to issuance of the Executive Order, the U.S. Department of Transportation (DOT) issued a DOT Order for implementing the Executive Order on environmental justice (EJ). The DOT Order (Order 5610.2(a), "Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," 77 FR 27534, May 10, 2012) describes the process the Department and its modal administrations (including FTA) will use to incorporate EJ principles into programs, policies, and activities.

The Presidential memorandum accompanying EO 12898 identified Title VI of the Civil Rights Act of 1964 as one of several Federal laws that should be applied "to prevent minority communities and low-income communities from being subject to disproportionately high and adverse environmental effects." According to the U.S. Department of Justice, "...the core tenet of environmental justice—that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community's minority—flows directly from the underlying principle of Title VI itself."¹

Title VI prohibits discrimination by recipients of Federal financial assistance on the basis of race, color, and national origin, including the denial of meaningful access for limited English proficient (LEP) persons. Under DOT's Title VI regulations, recipients of Federal financial assistance are prohibited from, among other things, using "criteria or methods of administering its program which have the effect of subjecting individuals to discrimination based on their race, color, or national origin." For example, facially neutral policies or practices that result in discriminatory effects or disparate impacts violate DOT's Title VI regulations, unless the recipient can show the policies or practices are substantially justified and there is no less

¹ See Title VI Legal Manual, U.S. Department of Justice Civil Rights Division (2001), page 59.

discriminatory alternative. In addition, Title VI and DOT regulations prohibit recipients from intentionally discriminating against people on the basis of race, color, and national origin.

The overlap between the statutory obligation placed on Federal agencies under Title VI to ensure nondiscrimination in federally assisted programs administered by State and local entities, and the administrative directive to Federal agencies under the Executive Order to address disproportionate adverse impacts of Federal activities on minority and low-income populations explain why Title VI and environmental justice are often paired. The clear objective of the Executive Order and Presidential memorandum is to ensure that Federal agencies promote and enforce nondiscrimination as one way of achieving the overarching objective of environmental justice—fair distribution of the adverse impacts of, or burdens associated with, Federal programs, policies, and activities.

Over the years, U.S. DOT has encouraged a proactive approach to the implementation of environmental justice principles in its programs, policies, and activities. This is reflected in the DOT Order on Environmental Justice (DOT Order 5610.2(a)) which, consistent with E.O. 12898, sets forth a process by which DOT and its Operating Administrations, including FTA, will integrate the goals of environmental justice into their existing operations to ensure that consideration of EJ principles is an integral part of all programs, policies, and activities, from the inception of the planning process through to project completion, operations, and evaluation.

Definition Chart

Protected Categories	Definition	Examples
Race	An individual belonging to one of the accepted racial groups; or the perception, based usually on physical characteristics that a person is a member of a racial group	Black/African American, Hispanic/Latino, Asian, American Indian/Alaska Native, Native Hawaiian/Pacific Islander, White
Color	Color of skin, including shade of skin within a racial group	Black, White, Light Brown, Dark Brown, etc.
National Origin	Place of birth. Citizenship is not a factor. Discrimination based on language or a person's accent is also covered by national origin.	Mexican, Cuban, Japanese, Vietnamese, Chinese

Title VI Notice to the Public

The following is GREAT's Title VI notice to the public:

Notification of Rights Title VI of the Civil Rights Act of 1964 states:

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Greenville Area Transit (GREAT) is committed to ensuring that no person is excluded from participation in, or denied the benefits of the its transit services, which are provided without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act.

Any person who desires additional information about GREAT's Title VI obligations, or any person who believes they have been aggrieved by any unlawful discriminatory practice by GREAT should contact the Transit Manager at (252) 329-4047.

The foregoing notice is published on GREAT's web site (GreenvilleNC.gov) and at the GREAT administrative offices, which are located at 1500 Beatty Street, Greenville, NC, 27834. This notice is also posted on all of the GREAT buses.

Procedures for Complaints of Discrimination

The purpose of these procedures is to specify the process to be employed by GREAT to receive, review, and investigate complaints of discrimination, while ensuring due process for all parties involved. These procedures apply to all beneficiaries of the GREAT programs, activities, and services, including but not limited to the public, contractors, subcontractors, and other sub-recipients of federal funding. This process does not preclude the responsible staff of any agency from attempting to informally resolve complaints.

Any person who believes that he/she has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964 may obtain a Title VI Complaint Form at no cost by calling the Transit Manager at (252) 329-4047 or by downloading the form from the GREAT web site. They can then complete the form and thereby submit their complaint in writing to the Transit Manager at 1500 Beatty Street, Greenville, NC, 27834.

Any person who believes that he/she has been subjected to discrimination or retaliation prohibited by Title VI of the Civil Rights Act of 1964 may also visit the GREAT administrative offices located at 1500 Beatty Street, Greenville, NC, 27834 and submit the complaint to the Transit Manager in person.

And any person may submit a complaint as heretofore described on behalf of any other person or persons who they believe has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964.

GREAT will only consider complaints that are submitted within 180 days of the date of the alleged discrimination upon which the complaint is based or within 180 days of the date upon which the alleged discrimination becomes known to the complainant. Upon receipt of a complaint, GREAT will conduct an initial review and send the complainant an acknowledgement letter within 14 days of receipt of the complaint. This acknowledgement letter will inform the complainant whether the complaint will be investigated and whether any additional information is needed for a proper investigation. If the latter is the case, the complainant has 21 days from the date of the acknowledgement letter to provide the additional information. Upon receipt of the additional information, GREAT then has 30 days to complete the investigation. If no

additional information was needed by GREAT, however, then the investigation is to be completed within 30 days of the date of the acknowledgement letter.

The Transit Manager, with assistance from the City Attorney, is the party responsible for investigating all complaints. At the completion of each investigation, GREAT will issue one of two letters to the complainant: a closure letter or a letter of finding. A closure letter summarizes the allegations and facts, and states that there was no Title VI violation and that the matter is therefore closed. A letter of finding summarizes the allegations and facts, and explains the action to be taken to properly address the finding. If the person submitting the complaint desires to appeal the decision issued by GREAT, they may do so by submitting the matter to the FTA Office of Civil Rights, 1200 New Jersey Avenue, Washington, DC 20590 within 30 days of the date of either the closure letter or the letter of finding.

At any time, a person may also file a complaint directly with the FTA Office of Civil Rights, 1200 New Jersey Avenue, Washington, DC 20590.

Title VI Complaint Form

GREAT's Title VI Complaint Form is attached. It is available at no cost by calling the Transit Manager at (252) 329-4047 or by downloading the form from the GREAT web site.

Title VI Investigations, Complaints, and Lawsuits

GREAT uses the GREAT Title VI Investigations, Complaints, and Lawsuits Log that is attached to record all Title VI related investigations, complaints, and lawsuits. Since the last submission of GREAT's Title VI Plan, there have been no such investigations, complaints, or lawsuits, and there are currently no such investigations, complaints, or lawsuits.

Public Participation Plan

The primary objectives of GREAT's Public Participation Plan are to 1) inform and educate citizens and other interested parties about ongoing GREAT planning activities and services, and their potential role in those activities, and 2) to provide specific opportunities for local citizens and citizen-based organizations to discuss their views and provide input on the subject areas addressed in plans, projects, services, or policies of GREAT. In order to accomplish these objectives, GREAT coordinates with individuals, institutions, and/or organizations to reach out to all members of the community including those who live in predominantly minority and/or low income neighborhoods. And opportunities for public participation are provided through means other than just written communication.

Public Meetings:

In general, all Public meetings are advertised in advance and held in convenient and accessible locations and facilities. Upon request, GREAT will provide meeting material in an alternate format and special assistance will be available to persons with disabilities.

First, there is a public transportation advisory committee meeting that is held at 1500 Beatty Street, Greenville, NC 27834 at 9:15 a.m. on the third Wednesday of each month. The meetings are advertised in advance. They are open to the public. The meeting location is fully accessible. And the meeting location is served by GREAT Route #1 so that everyone who rides the bus can attend at their pleasure.

GREAT also conducts public meetings whenever a change in service of any significance is contemplated. This occurred most recently in calendar year 2013 during the development of GREAT's short range transit development plan. Two public meetings were held. They were advertised in advance. They were open to the public. The meeting locations were fully accessible. And the meeting locations were served by two GREAT routes in the case of one of the meetings and by all six of the GREAT routes in the case of the other meeting. GREAT gave away free ride passes to everyone who attended the meetings and both meetings were well attended by those who regularly ride the buses.

Outreach Tools

General Public Relations

General public relations are used by GREAT to remind the community as a whole about the positive aspects of the services provided by GREAT and public transportation in general. Specific efforts include GREAT's web site, posters on the buses, and the public service advertising that is conducted by GREAT. The latter includes announcements about GREAT's holiday services. These announcements are made via the print media, including a minority targeted newspaper. They serve to keep the general public aware of the presence of GREAT and even the status of specific projects so that they may develop an interest and choose to become better informed or actively involved.

Special Events

Special events, whether they are initiated by GREAT or other organizations within the community, are an opportune time to promote and educate the public about the services provided by GREAT. Every year, for example, "Pirate Fest" is held in Greenville and GREAT participates in this event by offering a free ride day as a way of saying "thank you" to those who are already patrons, and as a way of saying "you are welcome" to those who don't normally ride the bus, regardless of the reason. Other special events may take the form of a job fair or a community services fair that are often provided to specific population groups. GREAT's participation in these special events is an excellent way to disseminate information about the GREAT services that otherwise might go unknown.

Surveys

Surveys are used by GREAT to gather input from a large number of people concerning their thoughts about both the current and future GREAT services. As an outreach tool, surveys are also a good way to identify citizens who may want to become further

involved. Surveys are administered in person, as they were during the development of GREAT's short range transit plan, or on the phone or distributed via mail, on the Internet, or at public places.

Community Information Meetings

GREAT uses community information meetings whenever a change in service of any significance is contemplated. These meetings are conducted in the format of an "open house" where individuals attending receive one-on-one attention. This approach has proven most effective in insuring that 1) people clearly understand the change being proposed and how it will affect them, and 2) their thoughts about the change are duly recorded. This is because the one-on-one approach removes the reluctance that many people have in asking for clarification or expressing themselves in the presence of a large group.

Public Hearings

Public hearings are held in accordance with Federal Transit Administration requirements. Generally, public hearings mark the end of a planning process and the beginning of the implementation process or the submission of a grant funding request. Public hearings are advertised in advance. This advertisement includes the specific proposal that is to be considered. The public hearings are open to the public. The meeting location is fully accessible. And the meeting location is served by GREAT routes so that everyone who rides the bus can attend if they so desire.

Direct Marketing and Education

Direct marketing and education is designed to reach out and provide specific information to specific parties. For example, landowners or leaders of an ethnic community may be sought out and personally invited to come to a meeting. Similarly, lower income groups may be specifically targeted to be educated about their rights, or children or families may be targeted to begin a discussion on a specific program. Direct marketing and education can take place through direct mailings, radio, the local government television channel, press advertising, or through meetings with specific groups of people such as local clubs and associations, neighborhood groups, property owners, housing authorities, etc. It can also be through direct phone calls or meeting with key people who desire to participate in a given process.

Plan Monitoring and Evaluation

Evaluation of the success of any public participation plan must be result-oriented. It is never safe to assume that just because people don't come to an event that they are uninterested in the project. The goal is to educate and include the public at all levels of planning, not just to invite them. Evaluation, then, must be two-fold. The first part is to track what efforts are being made, and the results of those efforts, and the second part is to make regular assessments of the success of a technique within a given program, and to

strategize for future successes. Generally, such successes occur when public participation is highest during the early stages of the planning process and lowest at the latter stages of the process.

Tracking Efforts and Success

GREAT tracks its public participation efforts. Since the previous Title VI Plan submission, these efforts have included:

1. Monthly public transportation advisory committee meetings.
2. Annual public hearings concerning the annual program of projects and federal grant applications.
3. Annual participation in "Pirate Fest."
4. Two direct marketing and education efforts: one with an African American community to discuss planned service improvements; and the other with a Hispanic community to discuss public transportation in general and the planned intermodal transportation center more specifically.
5. Six direct marketing and education efforts via the formation of a steering committee that guided the development of GREAT's short range transit plan. This committee included representatives of agencies that serve minority and low income population groups, and it also included four people who regularly ride the bus, three of which are African Americans.
6. Two community information meetings to receive input on the various service proposals associated with the development of GREAT's short range transit plan.
7. Multiple advertisements in the minority print media about the GREAT services.
8. Participation in a special event designed to provide those recovering from a drug and/or alcohol dependency with information about the community services available to them.
9. One direct marketing and education effort via the translation of the GREAT Ride Guide in Spanish and the dissemination of same throughout the Hispanic community.

Limited English Proficiency Plan (LEP)

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP." These individuals may be entitled to language assistance with respect to a particular type or service, benefit, or encounter. Federal laws particularly applicable to language access include Title VI of the Civil Rights Act of 1964, and the Title VI regulations, prohibiting discrimination based on national origin, and Executive Order 13166 issued in 2000.

Many individual federal programs, states, and localities also have provisions requiring language services for LEP individuals. An Executive Order is an order given by the President to federal agencies. The LEP Executive Order (Executive Order 13166) states that people who are LEP should have meaningful access to federally conducted and federally funded programs and activities. Executive Order 13166 requires all agencies that provide federal financial assistance to issue guidance on how recipients of that assistance can take reasonable steps to provide

meaningful access consistent with Title VI and the Title VI regulations. The Order also requires that federal agencies create plans for ensuring that their own activities also provide meaningful access for persons who are LEP.

GREAT provides a means of communication to individuals whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. More specifically, GREAT:

1. Conducts a needs assessment following a government census (see attached).
2. Provides its Ride Guide in Spanish.
3. Provides language assistance and interpretation through bilingual staff whenever they are on duty or through assistance from the East Carolina University or Pitt Community College Foreign Language Departments.
4. Provides training for all of its employees in “Basic Spanish for Transit Employees” through a project sponsored by the Colorado Department of Transportation.
5. Provides notice of the foregoing in all of its brochures and in the GREAT administrative offices.

Committee Membership

There is only one non-elected standing committee associated with GREAT. This is the Public Transportation and Parking Commission (PTPC). The PTPC consists of seven (7) members, all of whom are appointed by Greenville City Council subsequent to review of all applications received by the time of the appointments. All Greenville citizens are encouraged to apply via the notice that is routinely placed in the print media; the City’s television station (GTV9); the City’s web site; and in the bulletin board in the first floor lobby of City Hall.

The racial make-up of the City as a whole and the PTPC on a percentage basis is denoted below:

Group	Caucasian	African American	Hispanic	Asian	All Other
City Population	54.8	37.0	3.8	2.4	2.0
PTPC	83.3	16.7	0.0	0.0	0.0

Subrecipient Monitoring

This section is not applicable as GREAT has no subrecipients.

Equity Analysis

This section is not applicable as GREAT has not constructed a facility of any kind. However, a facility is planned and GREAT commits to the following:

GREAT shall integrate an environmental justice analysis into their National Environmental Policy Act (NEPA) documentation of construction projects. If a Categorical Exclusion (CE) is performed, GREAT shall complete the FTA's standard checklist which includes a section on community disruption and environmental justice. While preparing an Environmental Assessment (EA) or Environmental Impact Statement (EIS), GREAT shall integrate into their documents, the following:

1. A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population;
2. A discussion of all adverse effects that would affect the identified minority and low-income population.
3. A discussion of all positive effects that would affect the identified minority and low-income population;
4. A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues, and the replacement of the community resources destroyed by the project, if applicable;
5. A discussion of the remaining effects, if any, and why further mitigation is not proposed; and
6. For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison will be completed of mitigation and environmental enhancement actions between the two stated areas. If there is no basis for such a comparison, GREAT shall describe why this is so.

Title VI Plan Approval

GREAT's Title VI Plan has been reviewed and approved by the City of Greenville City Manager who is the Authorizing Official designated by Greenville City Council. Please see page 16 signatory page.

Service Standards

Vehicle Load Standard

GREAT owns and operates 11, 35 foot low floor buses. These buses have 32 seats and can safely accommodate up to 16 standees, resulting in a load factor of 1.5. This load factor is applied throughout the service day just as the number of vehicles in revenue service (six (6)) remains the same throughout the service day. Thus the passenger load on any particular trip on any route should not exceed a total of 48 passengers.

GREAT Routes 3 and 6 serve Pitt Community College and at the beginning of each academic semester, it is not unusual for the passenger loads on these routes to exceed the established load factor of 1.5. This overloading is predictable and GREAT responds by placing an extra bus into service as an express tripper. Rarely is there any overloading reported on any of the other routes.

Vehicle Headway Standard

Six (6) buses are used to provide service on the six (6) GREAT routes from 6:20 a.m. until 7:00 p.m. Monday through Friday and from 9:20 a.m. to 6:00 p.m. on Saturday. A round trip on each route requires one (1) hour which is the standard headway for each route.

Route 4, however, is a partially alternating route meaning that the bus travels along portions "A" and "B" of the route one hour and then portions "A" and "C" the next hour. While there is therefore a one (1) hour headway on portion "A" of Route 4, there is a two (2) hour headway on portions "B" and "C." Correcting the latter is included in the short range transit plan recommendations and it is GREAT's intention to do so.

The short range transit plan also recommends a phased in reduction in headway to 30 minutes along all six (6) routes beginning with the highest ridership routes (Routes 6 and 3) and ending with the lowest ridership routes (Routes 4 and 1). This reduction in headway, of course, is dependent on additional funding.

On Time Performance Standard

A GREAT vehicle is considered on time if it departs a time point no more than one (1) minute early and no more than five (5) minutes late. GREAT's on time percentage goal is equal to 95 percent or better. GREAT tracks on time performance using NextBus. Generally, the routes with the highest ridership (especially wheelchair passenger ridership) are the routes with the lowest on time performance. The length of the route is the next most significant factor affecting on time performance. The short range transit plan recommends a number of route changes to address the latter. These particular changes involve no net increase in cost and are expected to be implemented in the summer of 2014.

Service Availability Standard

GREAT's service availability standard is two-fold. First, it is GREAT's goal to provide service throughout the City of Greenville so that at least 70 percent of the City's geographic area is within one-quarter of a mile of a GREAT bus route. Second, GREAT's goal is to provide service within one-quarter of a mile to at least 90 percent of all major transit ridership generators. The latter includes major retail centers, hotels, hospitals and medical facilities, libraries, government centers, and colleges and universities.

Currently, the actual percentage corresponding to the two goals noted herein are 69 and 100 percent, respectively. It is GREAT's intention to increase the 69 percent actual via the route changes that are expected to be implemented in the summer of 2014.

the Civil Rights Act of 1964 (hereinafter referred to as the "Regulations") to the end that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the City receives Federal financial assistance and will immediately take any measures necessary to effectuate this agreement. Without limiting the above general assurance, the City agrees:

1. Each "program" and "facility" (as defined in Sections 21.23(e) and 21.23(b)) will be conducted or operated in compliance with all requirements of the Regulations.
2. It will insert the clauses of this assurance in every contract subject to the Act and the Regulations.
3. Where Federal financial assistance is received to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
4. Where Federal financial assistance is in the form or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.
5. It will include the appropriate clauses set forth in this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the sponsor with other parties:
 - (a) for the subsequent transfer of real property acquired or improved with Federal financial assistance under this Project; and
 - (b) for the construction or use of or access to space on, over, or under real property acquired or improved with Federal financial assistance under this Project.
6. This assurance obligates the City for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of personal property or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the sponsor or any transferee for the longer of the following periods:
 - (a) the period during which the property is used for a purpose for which Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits, or
 - (b) the period during which the City retains ownership or possession of the property.
7. It will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other sponsors, subgrantees, contractors, subcontractors,

transferees, successors in interest, and other participants or Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this assurance.

8. It agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining Federal financial assistance and is binding on its contractors, the sponsor, subcontractors, transferees, successors in interest and other participants in the Project. The person or person whose signature appears below is authorized to sign this assurance on behalf of the recipient.

Dated 3/5/14

By Barbara Inpruit
City Manager, City of Greenville, NC

Note: Annual Certifications and Assurances are pinned annually in TEAM as required.

Plan Review and Approval

The GREAT Title VI Plan has been reviewed and approved by the undersigned, who is the Authorizing Official as designated by the Greenville City Council.

Dated 3/5/14

By Barbara Inpruit
City Manager, City of Greenville, NC

GREAT Title VI Complaint Form

Page 1 of 2

Section I:

Name:	
Address:	
Telephone #1:	
E-Mail Address:	

Telephone #2:	
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Section II:

Are you filing this complaint on your own behalf?

☐ Yes☐ No

If you answered "yes" to this question, go to Section III.

If you answered "no" to this question,
please provide the name and the relationship
of the person for whom you are complaining.

Name:	
-------	--

Relationship:	
---------------	--

Please explain why you are filing a complaint for someone else.

--

Have you have obtained the permission of the person
for whom you are complaining?

☐ Yes☐ No

Section III

What was the discrimination about which you are complaining based on ("X" all that apply)

<input type="checkbox"/> Race

<input type="checkbox"/> Color

<input type="checkbox"/> National Origin
--

What was the date of the alleged discrimination (mm/dd/yy):

--

At the top of the next page, please explain as clearly as possible what happened and why you believe there was discrimination. Describe all persons who were involved. Include the name(s) and contact information of the person(s) who you believe did the discriminating (if known). Include the name(s) and contact information of any witnesses. You may also attach any written material or other information that you think is relevant to the complaint.

GREAT Title VI Complaint Form

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Section IV

Have you previously filed a Title VI complaint with GREAT?

☐ Yes

☐ No

Have you filed this complaint with any other Federal, State or local agency, or with and Federal or State Court?

☐ Yes

☐ No

If you answered this question "yes," please place an "X" and identify all that apply.

X	Name	
	Federal Agency	
	Federal Court	
	State Agency	
	State Court	
	Local Agency	

If you identified any agency/court, please provide information about a contact person at the agency/court where the complaint was filed.

Name:	
Title:	
Agency/Court:	
Address:	
Telephone:	

Section V

Signature and date are required:

Signature

Date

Please mail or submit this form in person to: Transit Manager, GREAT, 1500 Beatty Street,
Greenville, NC 27834

GREAT Title VI Investigations, Complaints, and Lawsuits Log

Investigations conducted by FTA or entities other than FTA:

ID	Date Filed	Basis (R, C, N)	Summary of the allegation
Complainant			
Status (Active or Closed)			
Final Finding			
Action Taken			

ID	Date Filed	Basis (R, C, N)	Summary of the allegation
Complainant			
Status (Active or Closed)			
Final Finding			
Action Taken			

ID	Date Filed	Basis (R, C, N)	Summary of the allegation
Complainant			
Status (Active or Closed)			
Final Finding			
Action Taken			

GREAT Title VI Investigations, Complaints, and Lawsuits Log

Complaints filed using GREAT Title VI Complaint Form:

ID	Date Filed	Basis (R, C, N)	Summary of the allegation
Complainant			
Status (Active or Closed)			
Final Finding			
Action Taken			

ID	Date Filed	Basis (R, C, N)	Summary of the allegation
Complainant			
Status (Active or Closed)			
Final Finding			
Action Taken			

ID	Date Filed	Basis (R, C, N)	Summary of the allegation
Complainant			
Status (Active or Closed)			
Final Finding			
Action Taken			

GREAT Title VI Investigations, Complaints, and Lawsuits Log

Lawsuits:

ID	Date Filed	Basis (R, C, N)	Summary of the allegation
Complainant			
Status (Active or Closed)			
Final Finding			
Action Taken			

ID	Date Filed	Basis (R, C, N)	Summary of the allegation
Complainant			
Status (Active or Closed)			
Final Finding			
Action Taken			

ID	Date Filed	Basis (R, C, N)	Summary of the allegation
Complainant			
Status (Active or Closed)			
Final Finding			
Action Taken			

GREENVILLE AREA TRANSIT SYSTEM

LIMITED ENGLISH PROFICIENCY NEEDS ASSESSMENT

February 2014

Purpose

The purpose of this Limited English Proficiency Needs Assessment is to ensure compliance with the Federal Transit Administration's (FTA) requirements to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin by any entity receiving federal financial assistance. GREAT takes reasonable proactive steps to provide meaningful access to its transit services for persons who do not speak English as their primary language and who have limited ability to speak, read, write or understand English. The FTA refers to these persons as Limited English Proficient (LEP)

LEP Needs Assessment – The Four-Factor Analysis

Factor 1: The number or proportion of LEP persons in the service area who may be served or are likely to encounter a transit program, activity, or service.

GREAT's fixed route and ADA paratransit service covers most areas of the City, including most the lower socio-economic residential areas. Therefore; transit staff and drivers could have interaction with individuals who speak English less than "very well" anywhere in the service area.

A review of the 2010 Census data reveals that 6.2 percent (or 4,416 people) of the total population five years of age or older speak a language other than English at home, and of that of this group, there are 1,307 people who speak English less than very well. This information is contained in the chart immediately below.

English	66,913	Speaks English Less Than "Very Well"
Spanish	2,038	766
Other Indo European	1,089	165
Asian and Pacific Islander	921	342
Other	368	34
Total (Other than English)	4,416	1,307

The total population of Greenville, NC is 84,554 according to the 2010 Census. The racial make-up of this population is as follows:

Group	Caucasian	African American	Hispanic	Asian	All Other
City Population %	54.8	37.0	3.8	2.4	2.0
City Population #	46,349	31,272	3,213	2,029	1,691

Through examination of the above Census data, discussion with Transit drivers and other City staff as well as with representatives of various human service agencies, it is determined that the overwhelming majority of the population speaks only English, and that Spanish is the most prevalent language assistance need.

Factor 2: The frequency with which LEP persons come in contact with Public Transit programs, activities or services.

GREAT continually assesses the frequency with which bus drivers and staff come in contact with LEP individuals. This is accomplished via the daily shift change briefings that GREAT is able to conduct, largely because GREAT is a relatively small transit system with only one shift change per day and with only six (6) drivers per shift.

The only contacts to date with LEP persons have been with Spanish speaking individuals and they are intermittent. However, to accommodate their needs, GREAT publishes its Ride Guide in Spanish, and all transit drivers have been trained in "Basic Spanish for Transit Employees." In addition, GREAT is fortunate to have one transit driver who is fluent in Spanish, and this person has occasionally been used as a translator whenever he has been on duty and the need has arisen. Again, such need has been intermittent and there have been no requests for the translation of any other documents. Also there has been no noted contact with any LEP individuals other than those who speak only Spanish.

Factor 3: The Importance to LEP Persons of Your Program, Activities and Services

GREAT considers public transit to be an important and essential service for everyone within the Greenville community, including LEP persons. Ridership continues to increase, which is a clear indication that more and more people are for the first time taking advantage of the GREAT services available to them, and that those who are already riding are riding more often.

Without access to public transportation, many people within the Greenville community would not be able to take advantage of the many other services and opportunities that are available citywide. This is especially true for LEP individuals, which is why information on the bus routes and schedules, the fares, the transfers, and the rules and regulations associated with riding the bus are important to an LEP person's ability to effectively utilize public transportation. With this information, they can then use the GREAT services to travel about the City just any other person might do, and they will gain access to the many education, employment, healthcare, social services, shopping and recreational activities that can be reached by using the six (6) bus routes provided by GREAT.

Factor 4: The Resources Available to GREAT and Costs

Currently there is a transit driver who speaks Spanish and the City of Greenville employs several bi-lingual persons in other Departments who are available to assist with translation needs on an as needed basis. East Carolina University translation services are also available to the City, which was the service used to publish the GREAT Ride Guide in Spanish. And bus drivers

continue to receive practice on “Basic Spanish for Transit Employees” which targets the special language needed to communicate transit needs to this LEP population.

GREAT is committed to providing LEP individuals with whatever assistance they require to access the services. These methods include but are not limited to reading instructions and applications to the individual, filling in the information they provide orally on necessary applications, and directing/assisting them to the correct transit vehicle.

GREAT’s total marketing budget is \$6,000. Twenty percent of this budget could be earmarked for additional language assistance expenses, if necessary. However, at this time, minimal expenses have been incurred as most translation is done by staff or volunteers. Publishing the schedules and print materials is an ongoing expense. There will be a greater need for more language assistance as more and more LEP persons ride public transit; therefore, GREAT is committed to devoting more funds and increasing the budget in reasonable increments to support the LEP requirement.

Conclusion

Based on the four factor analysis, it is concluded that the LEP Plan included in GREAT’s Title VI Plan compliments and supports GREAT’s success in insuring that LEP individuals have equal opportunity to take advantage of the services provided by GREAT.

February 2014